

Site: Cargill, Inc.
M089801-312-04

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
TO: Greg Reesor		(Record of item checked above)	
FROM: Wes McCall E&E		DATE: 12-9-88	TIME: 1045
SUBJECT: Cargill Incorporated, St. Louis Bellefontaine Neighbors, MO			
SUMMARY OF COMMUNICATION			
<p>On 11/18, Wes McCall conducted a PA reconnaissance with current ^{property} owner Thomas R. "Robert" Moss. Wes inspected landfill in NE corner of property and found it had been capped and the cap had a good grass cover. However, he noted that fiberboard (2-3 truckloads) which appeared to contain asbestos had been dumped on top of the cap. He took samples of the fiber board. (Fontaine Woods)</p> <p>A nursing home adjacent to the property has had asbestos sampling done and the results showed contamination. The nursing home is trying to get Mr. and Mrs. Moss to pay for the cleanup which is estimated at \$12,000. Fontaine Woods has ^{has} evidently given the Mosses until the first of the year to volunteer to pay. Mrs. Moss may be calling me to request information.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES			
TO: Kerry Herndon			

RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☒ CONFERENCE
☐ OTHER (SPECIFY)

TO: Wolfgang Brandner ARTX/
 JoAnn Heiman, TOPE/ASBS
 " "

FROM: (Record of item checked above)
 Greg Reesor

DATE 2-17-89

TIME 11:00 am

SUBJECT Cargill, Inc., Belkfontaine Neighbors, Mo

SUMMARY OF COMMUNICATION

I met w/ Mr. Brandner and Ms. Heiman to determine how to handle the 2-3 pickup truck loads of asbestos that ~~are~~ were dumped on top of the covered asbestos at the Cargill site. Mr. Brandner explained that this is an illegal dumping under the NESHAP program. He said that Missouri has authority for this program. Ms. Heiman suggested I call Steve Feeler (314) 751-4817 in Missouri and refer site to him.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Required action

When I receive the PA report from E&E, I will prepare letter to refer site to Mo. NESHAP program for action. (CC: JoAnn Heiman)

INFORMATION COPIES

TO: Kerry Herndon

Cargill - Belkfontaine
 10/20/89
 101



ecology and environment, inc.

CLOVERLEAF BUILDING 3, 6405 METCALF, OVERLAND PARK, KANSAS 66202, TEL. 913/432-9961

International Specialists in the Environment

Site: Cargill Inc.
ID #: MOD 92062204
Rev: 1.01
Uth:

MEMORANDUM

RECEIVED

APR 12 1989

PREP SECTION

TO: Pete Culver, RPO

THRU: Sharon Martin, AFITOM

FROM: Wesley McCall, E & E/FIT

DATE: April 12, 1989

SUBJECT: Recommendations for further work at the Cargill Inc. Site, 665 St. Cyr Road, Bellefontaine Neighbors, St. Louis, Missouri.
TDD #F-07-8808-028 PAN #FM00715PA
Site #V19 Project #001
Superfund Contact : Greg Reesor

The Cargill Inc. Site consists of a landfill mound of asbestos wastes and a large warehouse complex situated on approximately 21 acres of land. The site has been divided into two tracts of land. This property is located at the edge of an industrial area in urban Bellefontaine Neighbors, a subdivision of St. Louis, Missouri. Though the site is zoned industrial it is immediately adjacent to residential areas. The integrity of the landfill has not been compromised and the landfill cover is vegetated heavily with fescue. However, several cubic yards of material, primarily construction fiberboard, have been deposited on the surface of this mound. Analyses of samples of this material reveal that it is composed of up to 37% asbestos. The plat map of the property filed with the city of St. Louis indicates that the buildings on site were originally constructed of corrugated asbestos on steel. The Fontaine Woods Nursing Home is located at the west boundary of the site. Legal suit has recently been filed by the nursing home against the present owners of the site due to alleged asbestos contamination of the soil at the nursing home.

Two businesses maintain warehouse facilities and office space in the on-site buildings. Unless the original construction materials consisting of asbestos have been removed the workers are probably being exposed to significant levels of this hazardous material. The FIT recommends that an inspection of the buildings be carried out to determine whether the asbestos wall board and insulation have been removed.

Cargill Inc. Site
Recommendations for Further Work
Page 2

Significant amounts of asbestos waste were probably exposed at the surface until Cargill Inc. properly landfilled the material under the supervision of the Missouri Department of Natural Resources (MDNR) in 1981. A Notification of Hazardous Waste Site form filed by the MDNR indicates that an unknown amount of asbestos waste was left on site by the previous owners. If this material was exposed at the surface, a significant air release of asbestos particulates to the nearby urban community may have occurred.

Hazardous Ranking System (HRS) scores were not evaluated since the wastes are buried and represent a low observed release potential to any of the migration pathways. In addition the small amount of asbestos fiber board present on the surface of the landfill is recommended for removal.

FIT recommends that the surficial asbestos waste be removed under supervision of the Missouri Department of Natural Resources since they oversaw the original work at the landfill. It may also be necessary for OSHA to inspect the buildings on site to determine if workers are being exposed to asbestos particulates. The landfill appears to be stable and well vegetated. Therefore it is recommended that the cap remain undisturbed and that its integrity be maintained by the present owner.

Site:	CARGILL INC
ID #:	MOD 98063/204
Break:	1.1
Other:	

JUN 28 1989

Mr. Mike Tharpe
Chief, Enforcement Section
Air Pollution Control Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Dear Mr. Tharpe:

Re: Cargill, Inc. Site MOD 98063/204
665 St. Cyr Road
St. Louis, Missouri

We are referring the subject Superfund site to your program as a possible NESHAP violation.

As the enclosed report indicates, approximately 8 to 10 cubic yards of an asbestos material has been deposited on top of an asbestos landfill. The integrity of the landfill has not been compromised, so the deposited material is the major concern.

If you have any questions about the site, please call Mr. Greg Reesor of my staff at (913) 236-2856.

Sincerely yours,

Kerry Herndon
Chief, Pre-Remedial
and State Program
Superfund Branch
Waste Management Division

Enclosure

cc: John Madras, MDNR
Joann Heiman, EPA/ARTX

WSTM:SPFD:PREP:REESOR:6/27/89 DISK GREGR CARGILL.WS4

PREP
REESOR

PREP
HERNDON

SP
6/26/89

JK
6-21-89



ecology and environment, inc.

CLOVERLEAF BUILDING 3, 6405 METCALF, OVERLAND PARK, KANSAS 66202, TEL. 913/432-9961

International Specialists in the Environment

MEMORANDUM

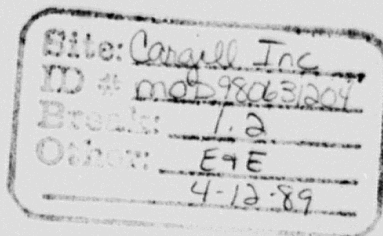
TO: Pete Culver, RPO

THRU: Sharon Martin, AFITOM

FROM: Wesley McCall, E & E/FIT

DATE: April 12, 1989

SUBJECT: Recommendations for further work at the Cargill Inc. Site,
665 St. Cyr Road, Bellefontaine Neighbors, St. Louis,
Missouri.
TDD #F-07-8808-028 PAN #FM00715PA
Site #V19 Project #001
Superfund Contact : Greg Reesor



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Cargill Inc. Site
Recommendations for Further Work
Page 2

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JUL 07 1989

Mr. Thomas Moss
10110 Bellefontaine
St. Louis, Missouri 63137

Site:	CARGILL
ID #:	MOD980631204
Break:	1.3
Other:	EPA

Dear Mr. Moss:

Re: Cargill, Inc. Site
Bellefontaine Neighbors, Missouri
ID # MOD980631204

Enclosed are the analytical data and field sheets for the samples taken from the fiber materials located on top of the landfill mound on your property at 665 St. Cyr Road in Bellefontaine Neighbors, Missouri. The samples were taken as part of the subject investigation on November 18, 1988 by Ecology and Environment, a contractor for the United States Environmental Protection Agency.

The results show that the materials contain chrysotile, a type of asbestos. The concentration of chrysotile found in the samples ranges from 7% to 37%. These results have been forwarded to Mr. Mike Tharpe of the Air Pollution Control Program of the Missouri Department of Natural Resources.

This information is forwarded to you in accordance with the provisions of Section 3007(a) of the Resource Conservation and Recovery Act of 1976 (RCRA) and Section 104(e)(4)(B) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986. If you have any questions regarding these results, please contact Mr. Greg Reesor of my staff at (913) 236-2856.

Sincerely yours,

Michael J. Sanderson
Chief, Superfund Branch
Waste Management Division

Enclosures

cc: John Madras, MDNR (w/ enclosures)

WSTM:SPFD:PREP:REESOR:gr:final:bh:7/3/89:Disk #1:cargill.ws4

PREP

PREP

SPFD

REESOR

HERNDON

SANDERSON

Sgt
7/6/89

pje for MBH
7/6/89

MJS
7/6/89

FMOB 7155H

OK-1

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION

01 STATE MO 02 SITE NUMBER D980631204

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Cargill Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 665 St. Cyr Rd				
03 CITY Bellevuefontaine Neighbors		04 STATE MO	05 ZIP CODE	06 COUNTY St. Louis	07 COUNTY CODE	08 CONG DIST
09 COORDINATES LATITUDE 38°44'17.38"		10 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER <input type="checkbox"/> G. UNKNOWN				

III. INSPECTION INFORMATION

01 DATE OF INSPECTION 11/18/88 MO/DAY/YR	02 SITE STATUS <input type="checkbox"/> ACTIVE <input checked="" type="checkbox"/> INACTIVE	03 YEARS OF OPERATION BEGINNING YEAR ENDING YEAR <input checked="" type="checkbox"/> UNKNOWN	
04 AGENCY PERFORMING INSPECTION (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> E & E/FIT <input type="checkbox"/> C. MUNICIPAL <input type="checkbox"/> D. MUNICIPAL CONTRACTOR (Name of firm) <input type="checkbox"/> E. STATE <input type="checkbox"/> F. STATE CONTRACTOR <input type="checkbox"/> G. OTHER (Name of firm)			

05 CHIEF INSPECTOR Wesley McCall	06 TITLE Geochemist	07 ORGANIZATION E & E/FIT	08 TELEPHONE NO. (913) 432-9961
09 OTHER INSPECTORS William Oberle	10 TITLE Biologist	11 ORGANIZATION E & E/FIT	12 TELEPHONE NO. (913) 432-9961
Dave Tyson	Scientist	E & E/FIT	(913) 432-9961

13 SITE REPRESENTATIVES INTERVIEWED Thomas R. Moss	14 TITLE Property Owner	15 ADDRESS 10110 Bellefontaine St. Louis, MO 63137	16 TELEPHONE NO. (913) 869-7864

17 ACCESS GAINED BY (Check one) <input checked="" type="checkbox"/> PERMISSION <input type="checkbox"/> WARRANT	18 TIME OF INSPECTION 09:00 hrs	19 WEATHER CONDITIONS Cloudy, 43°F, wind 10-15 mph
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IV. INFORMATION AVAILABLE FROM

1 CONTACT Gregg Reesor	02 OF (Agency/Organization) Region VII U.S. EPA		03 TELEPHONE NO. (913) 236-2856	
4 PERSON RESPONSIBLE FOR SITE INSPECTION FORM Wesley McCall	05 AGENCY FIT	06 ORGANIZATION E & E	07 TELEPHONE NO. (913) 432-9961	08 DATE 04/21/89

SITE INSPECTION REPORT

PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE
MO

02 SITE NUMBER
D980631204

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES

(Check all that apply)

<u>X</u> A. SOLID	E. SLURRY
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<u> </u>	B. POWDER, FINES	<u> </u>	F. LIQUID
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C. SLUDGE	G. GAS
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100	100

 D. OTHER

(Specify)

02 WASTE QUANTITY AT SITE

(Measures of waste quantities must be independent)

TONS

CUBIC YARDS unknown

[illegible]

03 WASTE CHARACTERISTICS

(Check all that apply)

X A. TOXIC E. SOLUBLE

 B. CORROSIVE F. INFECTIOUS

 C. RADIOACTIVE G. FLAMMABLE

X D. PERSISTENT H. IGNITABLE

 I. HIGHLY VOLATILE

 J. EXPLOSIVE

 K. REACTIVE

L. INCOMPATIBLE

 M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS	Unknown		
ACD	ACIDS			Asbestos wastes landfilled
BAS	BASES			
MES	HEAVY METALS			
IV. HAZARDOUS SUBSTANCES				

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)	
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[illegible]

V. FEEDSTOCKS (See Appendix for CAS Numbers)	
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CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific sources.)

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)		FDS	
Ecology and Environment			

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE
MO02 SITE NUMBER
D980631204

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED:

None known of or observed to date.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED:

None known of or observed to date.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 X C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED: >3000

Possible release of asbestos particulates to atmosphere from small amount of wastes on surface of landfill. Originally, material was an open pile before Missouri Department of Natural Resources required the pile to be covered and capped with soil.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

X POTENTIAL ALLEGED

01 D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED:

None known of or observed to date.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED:

None known of or observed to date.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 X F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: Unknown

(Acres)

Adjacent Fontaine Woods Nursing Home alleges analytical evidence of soil contamination by asbestos.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

X POTENTIAL ALLEGED

01 G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED:

None known of or reported to date.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

POTENTIAL ALLEGED

01 X H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED: Unknown

Possibility of asbestos construction materials in warehouses on site.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

X POTENTIAL ALLEGED

01 X I. POPULATION EXPOSURE/INJURY

03 POPULATION POTENTIALLY AFFECTED: >3000

Possible release of asbestos particulates to atmosphere from small amount of waste asbestos materials exposed on ground surface at present time.

02 OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

X POTENTIAL ALLEGED

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

I. IDENTIFICATION

01 STATE
MO02 SITE NUMBER
D980631204

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

II. HAZARDOUS CONDITIONS AND INCIDENTS (CONTINUED)

01 J. DAMAGE TO FLORA02 OBSERVED (DATE:) POTENTIAL ALLEGED

04 NARRATIVE DESCRIPTION

None known or observed to date.

01 K. DAMAGE TO FAUNA02 OBSERVED (DATE:) POTENTIAL ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None known or observed to date.

01 L. CONTAMINATION OF FOOD CHAIN02 OBSERVED (DATE:) POTENTIAL ALLEGED

04 NARRATIVE DESCRIPTION

None known or observed to date.

01 X M. UNSTABLE CONTAINMENT OF WASTES02 X OBSERVED (DATE: 11/18/88) POTENTIAL ALLEGED

(Spills/runoff/standing liquids/leaking drums)

03 POPULATION POTENTIALLY AFFECTED: >3000

04 NARRATIVE DESCRIPTION

Observation and analysis reveals asbestos waste exposed on surface.

01 X N. DAMAGE TO OFFSITE PROPERTY02 OBSERVED (DATE:) POTENTIAL X ALLEGED

04 NARRATIVE DESCRIPTION

Adjacent Fontaine Woods Nursing Home alleges analytical evidence of soil contamination with asbestos.

01 O. CONTAMINATION OF SEWERS,
STORM DRAINS, WWTPs02 OBSERVED (DATE:) POTENTIAL ALLEGED

04 NARRATIVE DESCRIPTION

None known or reported to date.

01 X P. ILLEGAL/UNAUTHORIZED DUMPING02 X OBSERVED (DATE: 11/18/88) POTENTIAL ALLEGED

04 NARRATIVE DESCRIPTION

Approximately 8 to 10 cubic yards of asbestos containing wastes dumped on surface of landfill after closure of the landfill.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None known of or observed to date.

III. TOTAL POPULATION POTENTIALLY AFFECTED: >3000

IV. COMMENTS

Original landfill maintains integrity, however, 8 to 10 cubic yards of asbestos containing material dumped on surface of landfill after closure. Recommend removal of this material.

V. SOURCES OF INFORMATION (Cite specific references. e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION

01 STATE
NO02 SITE NUMBER
D980631204

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED

(Check all that apply)

☐ A. NPDES☐ B. UIC☐ C. AIR☐ D. RCRA☐ E. RCRA INTERIM STATUS☐ F. SPCC PLAN☐ G. STATE (Specify)☐ H. LOCAL (Specify)☐ I. OTHER (Specify)☒ J. NONE

02 PERMIT NUMBER

03 DATE ISSUED

04 EXPIRATION DATE

05 COMMENTS

III. SITE DESCRIPTION

01 STORAGE/DISPOSAL

(Check all that apply)

☐ A. SURFACE IMPOUNDMENT☐ B. PILES☐ C. DRUMS, ABOVE GROUND☐ D. TANK, ABOVE GROUND☐ E. TANK, BELOW GROUND☒ F. LANDFILL☐ G. LANDFARM☐ H. OPEN DUMP☐ I. OTHER

(Specify)

02 AMOUNT

03 UNIT OF MEASURE

04 TREATMENT

(Check all that apply)

☐ A. INCINERATION☐ B. UNDERGROUND INJECTION☐ C. CHEMICAL/PHYSICAL☐ D. BIOLOGICAL☐ E. WASTE OIL PROCESSING☐ F. SOLVENT RECOVERY☐ G. OTHER RECYCLING/RECOVERY☒ H. OTHER None

(Specify)

05 Other

☒ A. BUILDINGS ON SITE

1 warehouse

06 AREA OF SITE

20.6 (Acres)

07 COMMENTS

The existing landfill mound is located on the NW portion of the property and rises 10 to 20 feet above the surrounding topography. The overall integrity of the landfill appears good, with no evidence of erosion. Thick fescue grass forms a stable cover over the mound. Recently 8 to 10 cubic yards of asbestos waste dumped on surface of existing landfill.

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)

☐ A. ADEQUATE, SECURE☐ B. MODERATE☒ C. INADEQUATE, POOR☐ D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.

Asbestos containing wall board (transite) and other asbestos containing wastes recently dumped on surface of landfill (8 to 10 cubic yards). Original landfill in good condition.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE:

YES

☒ NO

02 COMMENTS

Area fenced and locked gates.

VI. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

I. IDENTIFICATION

01 STATE
MO02 SITE NUMBER
D980631204

PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

II. DRINKING WATER SUPPLY

01 TYPE OF DRINKING SUPPLY
(Check as applicable)

02 STATUS

03 DISTANCE TO SITE

	SURFACE	WELL
COMMUNITY	A. <input checked="" type="checkbox"/>	B. <input type="checkbox"/>
NON-COMMUNITY	C. <input type="checkbox"/>	D. <input type="checkbox"/>

ENDANGERED	AFFECTED	MONITORED
A. <input type="checkbox"/>	B. <input type="checkbox"/>	C. <input type="checkbox"/>
D. <input type="checkbox"/>	E. <input type="checkbox"/>	F. <input type="checkbox"/>

Upstream
A. >5 (mi)
B. _____ (mi)

III. GROUNDWATER

01 GROUNDWATER USE IN VICINITY (Check one)

<input type="checkbox"/> A. ONLY SOURCE FOR DRINKING	<input type="checkbox"/> B. DRINKING (Other sources available)	<input type="checkbox"/> C. COMMERCIAL, INDUSTRIAL IRRIGATION (Limited other sources available)	<input checked="" type="checkbox"/> D. NOT USED, UNUSABLE
COMMERCIAL, INDUSTRIAL, IRRIGATION (No other water sources available)			
Very limited industrial use.			

02 POPULATION SERVED BY GROUND WATER None03 DISTANCE TO NEAREST DRINKING WATER WELL No wells (mi)04 DEPTH TO GROUNDWATER
Unknown (ft)05 DIRECTION OF GROUNDWATER FLOW
Unknown06 DEPTH TO AQUIFER
OF CONCERN
N/A (ft)07 POTENTIAL YIELD
OF AQUIFER
N/A (gpd)08 SOLE SOURCE AQUIFER
☐ YES ☒ NO09 DESCRIPTION OF WELLS (Including usage, depth, and location relative to population and buildings)
None.

10 RECHARGE AREA

☐ YES
☐ NOCOMMENTS
N/A

11 DISCHARGE AREA

☐ YES
☐ NOCOMMENTS
N/A

IV. SURFACE WATER

01 SURFACE WATER USE (Check one)

Intake Upstream, Mississippi River

<input type="checkbox"/> A. RESERVOIR, RECREATION DRINKING WATER SOURCE	<input type="checkbox"/> B. IRRIGATION, ECONOMICALLY IMPORTANT RESOURCES	<input type="checkbox"/> C. COMMERCIAL, INDUSTRIAL	<input type="checkbox"/> D. NOT CURRENTLY USED
--	---	--	--

02 AFFECTED/POTENTIALLY AFFECTED BODIES OF WATER

NAME:

None.

AFFECTED

DISTANCE TO SITE

(mi)

(mi)

(mi)

V. DEMOGRAPHIC AND PROPERTY INFORMATION

01 TOTAL POPULATION WITHIN

ONE (1) MILE OF SITE	TWO (2) MILES OF SITE	THREE (3) MILES OF SITE
A. <u>>1000</u>	B. <u>>3000</u>	C. <u>>10,000</u>
NO. OF PERSONS	NO. OF PERSONS	NO. OF PERSONS

02 DISTANCE TO NEAREST POPULATION

< 1/4 (mi)

03 NUMBER OF BUILDINGS WITHIN TWO (2) MILES OF SITE

estimate >1000

04 DISTANCE TO NEAREST OFF-SITE BUILDING

< 1/10 (mi)05 POPULATION WITHIN VICINITY OF SITE (Provide narrative description of nature of population within vicinity of site,
e.g., rural, village, densely populated urban area)Bellefontaine Neighbors is a densely populated suburb of St. Louis, Missouri.

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION

01 STATE MO 02 SITE NUMBER D980631204

II. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one) N/A A. $10^{-6} - 10^{-8}$ cm/sec B. $10^{-4} - 10^{-6}$ cm/sec C. $10^{-4} - 10^{-3}$ cm/sec D. GREATER THAN 10^{-3} cm/sec			
02 PERMEABILITY OF BEDROCK (Check one) N/A A. IMPERMEABLE (Less than 10^{-6} cm/sec) B. RELATIVELY IMPERMEABLE ($10^{-4} - 10^{-6}$ cm/sec) C. RELATIVELY PERMEABLE ($10^{-2} - 10^{-4}$ cm/sec) D. VERY PERMEABLE (Greater than 10^{-2} cm/sec)			
03 DEPTH TO BEDROCK Unknown (ft)	04 DEPTH OF CONTAMINATED SOIL ZONE Unknown (ft)	05 SOIL pH Unknown	
06 NET PRECIPITATION 33.8 (in)	07 ONE YEAR 24 HOUR RAINFALL 3.95 (in)	08 SLOPE SITE SLOPE 0 - 30 %	DIRECTION OF SITE SLOPE TERRAIN AVERAGE SLOPE ~10 %
09 FLOOD POTENTIAL N/A SITE IS IN YEAR FLOOD PLAN		10 SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY	
11 DISTANCE TO WETLANDS (5 acre minimum) N/A ESTUARINE OTHER A. (mi) B. (mi)		12 DISTANCE TO CRITICAL HABITAT (of endangered species) N/A ENDANGERED SPECIES: (mi)	
13 LAND USE IN VICINITY DISTANCE TO: COMMERCIAL/INDUSTRIAL RESIDENTIAL AREAS; NATIONAL/STATE PARKS, FORESTS, OR WILDLIFE RESERVES AGRICULTURAL LANDS PRIME AG LAND AG LAND A. immediate (mi) B. $< 1/4$ (mi) C. > 10 (mi) D. > 10 (mi)			

4 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

The landfill forms an irregular quadrangle with a flat top which rises approximately 15 feet above the surrounding original topography. The sides of the mound are relatively steep (20 - 30% slope). The north and west sides of the mound are bounded by a small stream. The south and east sides of the landfill mound are bordered by leveled areas around the existing warehouse.

VII. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 6 - SAMPLE AND FIELD INFORMATION

I. IDENTIFICATION

01 STATE MO 02 SITE NUMBER
D980631204

II. SAMPLES TAKEN

SAMPLE TYPE	01 NUMBER OF SAMPLES TAKEN	02 SAMPLES SENT TO	03 ESTIMATED DATE RESULTS AVAILABLE
GROUNDWATER	5	U.S. EPA Region VII Lab	1/3/89
SURFACE WATER			
WASTE			
AIR			
RUNOFF			
SPILL			
SOIL			
VEGETATION			
OTHER			

III. FIELD MEASUREMENTS TAKEN

01 TYPE	02 COMMENTS
	None taken.

IV. PHOTOGRAPHS AND MAPS

01 TYPE <input type="checkbox"/> GROUND <input type="checkbox"/> AERIAL None.	02 IN CUSTODY OF _____ (Name of organization or individual)
03 MAPS <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	04 LOCATION OF MAPS Preliminary Assessment Report, TDD# F-07-8808-028

V. OTHER FIELD DATA COLLECTED (Provide narrative description)

None.

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

PART 7 - OWNER INFORMATION

I. IDENTIFICATION

01 STATE MO 02 SITE NUMBER D980631204

II. CURRENT OWNER(S)

01 NAME Thomas R. Moss			02 D+B NUMBER			PARENT COMPANY (If applicable)			08 NAME			09 D+B NUMBER					
03 STREET ADDRESS (P.O. BOX, RFD #, ETC.) 10110 Bellefontaine						04 SIC CODE			10 STREET ADDRESS (P.O. BOX, RFD #, ETC.)						11 SIC CODE		
05 CITY St. Louis			06 STATE MO		07 ZIP CODE 63137		12 CITY			13 STATE		14 ZIP CODE					
01 NAME			02 D+B NUMBER			08 NAME			09 D+B NUMBER								
03 STREET ADDRESS (P.O. BOX, RFD #, ETC.)						04 SIC CODE			10 STREET ADDRESS (P.O. BOX, RFD #, ETC.)						11 SIC CODE		
05 CITY			06 STATE		07 ZIP CODE		12 CITY			13 STATE		14 ZIP CODE					
01 NAME			02 D+B NUMBER			08 NAME			09 D+B NUMBER								
03 STREET ADDRESS (P.O. BOX, RFD #, ETC.)						04 SIC CODE			10 STREET ADDRESS (P.O. BOX, RFD #, ETC.)						11 SIC CODE		
05 CITY			06 STATE		07 ZIP CODE		12 CITY			13 STATE		14 ZIP CODE					
01 NAME			02 D+B NUMBER			08 NAME			09 D+B NUMBER								
03 STREET ADDRESS (P.O. BOX, RFD #, ETC.)						04 SIC CODE			10 STREET ADDRESS (P.O. BOX, RFD #, ETC.)						11 SIC CODE		
05 CITY			06 STATE		07 ZIP CODE		12 CITY			13 STATE		14 ZIP CODE					

III. PREVIOUS OWNER(S) (List most recent first)

01 NAME Cargill Inc.			02 D+B NUMBER			IV. REALTY OWNER(S) (If applicable; list most recent first)									
03 STREET ADDRESS (P.O. Box, RFD #, etc.) P.O. Box 9300						04 SIC CODE			01 NAME			02 D+B NUMBER			
05 CITY Minneapolis						06 STATE MN		07 ZIP CODE 55440		03 STREET ADDRESS (P.O. Box, RFD #, etc.)			04 SIC CODE		
01 NAME			02 D+B NUMBER			05 CITY			06 STATE		07 ZIP CODE				
03 STREET ADDRESS (P.O. Box, RFD #, etc.)						04 SIC CODE			01 NAME			02 D+B NUMBER			
05 CITY						06 STATE		07 ZIP CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)			04 SIC CODE		
01 NAME			02 D+B NUMBER			05 CITY			06 STATE		07 ZIP CODE				
03 STREET ADDRESS (P.O. Box, RFD #, etc.)						04 SIC CODE			01 NAME			02 D+B NUMBER			
05 CITY						06 STATE		07 ZIP CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)			04 SIC CODE		
01 NAME			02 D+B NUMBER			05 CITY			06 STATE		07 ZIP CODE				

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

PART 8 - OPERATOR INFORMATION

I. IDENTIFICATION

01 STATE
MO02 SITE NUMBER
D980631204

II. CURRENT OPERATOR (Provide if different from owner)

OPERATOR'S PARENT COMPANY (If applicable)

01 NAME

02 D+B NUMBER

10 NAME

11 D+B NUMBER

inactive

03 STREET ADDRESS (P.O. BOX, RFD #, ETC.)

04 SIC CODE

12 STREET ADDRESS (P.O. BOX, RFD #, ETC.)

13 SIC CODE

05 CITY

06 STATE

07 ZIP CODE

14 CITY

15 STATE

16 ZIP CODE

08 YEARS OF OPERATION

09 NAME OF OWNER

III. PREVIOUS OPERATOR(S) (List most recent first; provide only if different from owner)

PREVIOUS OPERATORS' PARENT COMPANIES (If applicable)

01 NAME

Same as previous owner.

02 D+B NUMBER

10 NAME

11 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)

04 SIC CODE

12 STREET ADDRESS (P.O. Box, RFD #, etc.)

13 SIC CODE

05 CITY

06 STATE

07 ZIP CODE

14 CITY

15 STATE

16 ZIP CODE

08 YEARS OF OPERATION

09 NAME OF OWNER DURING THIS PERIOD

01 NAME

02 D+B NUMBER

10 NAME

11 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)

04 SIC CODE

12 STREET ADDRESS (P.O. Box, RFD #, etc.)

13 SIC CODE

05 CITY

06 STATE

07 ZIP CODE

14 CITY

15 STATE

16 ZIP CODE

08 YEARS OF OPERATION

09 NAME OF OWNER DURING THIS PERIOD

01 NAME

02 D+B NUMBER

10 NAME

11 D+B NUMBER

03 STREET ADDRESS (P.O. Box, RFD #, etc.)

04 SIC CODE

12 STREET ADDRESS (P.O. Box, RFD #, etc.)

13 SIC CODE

05 CITY

06 STATE

07 ZIP CODE

14 CITY

15 STATE

16 ZIP CODE

08 YEARS OF OPERATION

09 NAME OF OWNER DURING THIS PERIOD

IV. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# P-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE

SITE INSPECTION REPORT

PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION

01 STATE MO 02 SITE NUMBER D980631204

II. ON-SITE GENERATOR

01 NAME Inactive.	02 D+B NUMBER
03 STREET ADDRESS (P.O. BOX, RFD #, ETC.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE

III. OFF-SITE GENERATOR(S)

01 NAME None.	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

IV. TRANSPORTER(S)

01 NAME N/A	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION

01 STATE
MO02 SITE NUMBER
D980631204

II. PAST RESPONSE ACTIVITIES

01	A. WATER SUPPLY CLOSED	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	B. TEMPORARY WATER SUPPLY PROVIDED	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	C. PERMANENT WATER SUPPLY PROVIDED	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	D. SPILLED MATERIAL REMOVED	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	E. CONTAMINATED SOIL REMOVED	02 DATE	03 AGENCY
04	DESCRIPTION No known removal.		
01	F. WASTE REPACKAGED	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	G. WASTE DISPOSED ELSEWHERE	02 DATE	03 AGENCY
04	DESCRIPTION No known removal.		
01	X H. ON SITE BURIAL	02 DATE 1981	03 AGENCY MDNR
04	DESCRIPTION Landfilled asbestos wastes, oversight by MDNR.		
01	I. IN SITU CHEMICAL TREATMENT	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	J. IN SITU BIOLOGICAL TREATMENT	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	K. IN SITU PHYSICAL TREATMENT	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	L. ENCAPSULATION	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	M. EMERGENCY WASTE TREATMENT	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	N. CUTOFF WALLS	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	O. EMERGENCY DIKING/SURFACE WATER DIVERSION	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	P. CUTOFF TRENCHES/SUMP	02 DATE	03 AGENCY
04	DESCRIPTION None known.		
01	Q. SUBSURFACE CUTOFF WALL	02 DATE	03 AGENCY
04	DESCRIPTION None known.		

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION

01 STATE MO 02 SITE NUMBER
D980631204

II. PAST RESPONSE ACTIVITIES (Continued)

01 <input checked="" type="checkbox"/> R. BARRIER WALLS CONSTRUCTED	02 DATE 1981	03 AGENCY MDNR
04 DESCRIPTION Barrier walls at base of mound to prevent stream erosion.		
01 <input checked="" type="checkbox"/> S. CAPPING/COVERING	02 DATE 1981	03 AGENCY MDNR
04 DESCRIPTION Asbestos landfill mound completed, fescue grass to maintain integrity.		
01 <input type="checkbox"/> T. BULK TANKAGE REPAIRED	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> U. GROUT CURTAIN CONSTRUCTED	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> V. BOTTOM SEALED	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> W. GAS CONTROL	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> X. FIRE CONTROL	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> Y. LEACHATE TREATMENT	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> Z. AREA EVACUATED	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> 1. ACCESS TO SITE RESTRICTED	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> 2. POPULATION RELOCATED	02 DATE	03 AGENCY
04 DESCRIPTION None known.		
01 <input type="checkbox"/> 3. OTHER REMEDIAL ACTIVITIES	02 DATE	03 AGENCY
04 DESCRIPTION No actions beyond emplacement and maintenance of landfill mound known.		

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1999, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 11 - ENFORCEMENT INFORMATION

I. IDENTIFICATION

01 STATE MO	02 SITE NUMBER D980631204
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II. ENFORCEMENT INFORMATION

01 PAST REGULATORY/ENFORCEMENT ACTION ☒ YES ☐ NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

Missouri Department of Natural Resources (MDNR) oversaw construction of landfill.

III. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Ecology and Environment, Inc. Field Investigation Team, November 18, 1988, Preliminary Assessment of the Cargill Inc. Site, TDD# F-07-8808-028.



ecology and environment, inc.

CLOVERLEAF BUILDING 3, 6405 METCALF, OVERLAND PARK, KANSAS 66202, TEL. 913/432-9961

International Specialists in the Environment

Site:	Cargill Inc.
U#:	MO980621204
Page:	1.5
Other:	

MEMORANDUM

TO: Pete Culver, RPO

THRU: Sharon Martin, AFITOM

FROM: Wesley McCall, E & E/FIT

DATE: April 12, 1989

SUBJECT: Preliminary Assessment II of the Cargill Inc. Site,
665 St. Cyr Road, Bellefontaine Neighbors, St. Louis, Missouri
TDD# F-07-8808-028 PAN #FM00715PA
Site #V19 Project #001
Superfund Contact: Greg Reesor

INTRODUCTION

The Ecology and Environment, Inc., Field Investigation Team (E & E/FIT) was tasked by the Region VII U.S. Environmental Protection Agency (EPA), under Technical Directive Document (TDD) #F-07-8808-028 to conduct a Preliminary Assessment II (PA-II) of the Cargill Inc. Site. The purpose of this PA was to determine whether the integrity of the asbestos landfill on site was being maintained and whether any hazardous materials had been disposed improperly at the site.

SITE DESCRIPTION AND HISTORY

The Cargill Inc. Site is located in Bellefontaine Neighbors, just outside of the city of St. Louis, Missouri, at 665 St. Cyr Road. It is legally described as part of Section 9, Township 46 North, Range 7 East (Figure 1). This property was purchased by Cargill Inc. on April 3, 1974, from Brookwood Realty Company (see attached General Warranty Deed #1).

A field reconnaissance of the Cargill Site was conducted on November 11, 1988, by E & E/FIT member Wes McCall. The FIT interviewed Thomas R. Moss, who indicated that he had purchased the property from Cargill Inc. approximately five years ago. Moss said that the property had been owned by the National Gypsum Co. and that its name was on the building when he purchased the property.

The original 21-acre property is now divided into two tracts. The landfill one warehouse, and the attached loading dock constitute one tract presently owned by Thomas R. and Louise Moss (see attached General Warranty Deed #2). This tract consists of 14.45 acres. The second tract of property consists of a large warehouse and the remaining property. The plat map indicates that this tract is owned by Thomas R. Roach. This second tract consists of 6.18 acres. The plat (Figure 2) indicates that the warehouses are constructed of corrugated asbestos on steel.

These properties, which constitute the Cargill Inc. Site, are bounded on the south by St. Cyr Road, on the west by Fontaine Woods Nursing Home property, on the north by property of the Union Electric Co., and on the east by the Chicago, Burlington and Quincy Railroad right-of-way. The site sits atop a hill, and a stream flows along the north and west sides of the property.

The asbestos landfill is situated on the northwest portion of the tract owned by Thomas R. and Louise Moss. The landfill mound rises 10 to 20 feet above the surrounding topography. The overall integrity of the landfill mound appears to be good, with no evidence of erosion of the cap. Thick, lush fescue grass forms a stable cover over the entire mound. The rock and concrete wall along the stream on the north side of the landfill is in good condition and maintains the integrity of the landfill mound.

During the reconnaissance of the property the FIT discovered three areas along the northern margin of the landfill where material had been dumped on the surface of the mound. This material was composed of a fiber-type wallboard and some soft fibrous insulation material. Five samples were collected for asbestos content analysis. At least one sample was taken from each pile of material. The sample series for this activity was TKOC7. One sample of the wallboard contained visible chips of material that appeared to be fibrous serpentine or asbestos. The total volume of material dumped on the surface probably does not exceed 8 to 10 cubic yards.

The FIT concluded that the fiberboard and other materials dumped on top of the landfill mound was probably removed from the buildings on site. However, Moss had left the site before the dumped material was discovered, and the FIT did not have the opportunity to inspect the interior of the buildings.

While the FIT was on site, signs at the entrance to the Roach property indicated that two businesses were located in the existing warehouses. Moss had confirmed earlier that the buildings that these two companies occupy had been part of the original Cargill property. The company names and addresses are as follows:

Roach Equipment
Tom Roach, President
665 St. Cyr Road
telephone (314) 869-5400

RECO International Inc.
P.O. Box 5527
St. Louis, Missouri
665 St. Cyr Road
telephone (314) 869-7225.

PREVIOUS INVESTIGATIONS

Cargill Inc. filed a Notification of Hazardous Waste Site EPA form 8900-1 on May 4, 1981. The Missouri Department of Natural Resources (MDNR) inspected the site on June 29, 1981, and subsequently completed a Site Inspection Report (EPA form T2070-3). According to the SI report, MDNR's St. Louis office had worked with Cargill to attain surface stabilization of the asbestos slag pile. MDNR noted that the situation had been resolved through voluntary compliance by Cargill. They also noted that a minimum 12-inch cap covered the entire landfill mound. This SI report revealed that the previous owners (before Cargill) had left the asbestos slag and scrap waste deposited on site. The previous owners were not identified.

MDNR subsequently filed a Potential Hazardous Waste Site Identification (EPA form 2070-8) and a Tentative Disposition (EPA form T2070-4). Information included in these forms revealed that Cargill purchased this property in 1974, whereas the original buildings were constructed in 1951. In the Tentative Disposition MDNR suggested that no further investigative activity was required at this site.

DATA SUMMARY

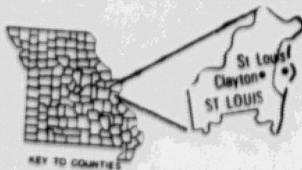
The complete data transmittal for the five samples collected at the Cargill Inc. Site was received on January 5, 1989. All of the samples were analyzed for asbestos by polarized light microscopy. Four of the samples consisted of fiber-type wallboard, and had asbestos contents ranging from 15 percent to 37 percent chrysotile. The fifth sample was a fibrous insulation type material and contained seven per cent chrysotile.

CONCLUSIONS

Field reconnaissance of the Cargill Inc. Site revealed that the integrity of the landfill mound has not been compromised. No erosion of the cover was observed, lush fescue grass grew over the entire mound, and the concrete-rock wall maintained stream flow.

Approximately 8 to 10 cubic yards of fiberboard and associated materials have been dumped on the surface of the landfill mound. This material consists of up to 37 percent chrysotile asbestos. It appears that this material may have been removed from the buildings on the Cargill Inc. Site. The survey plat indicates that the buildings on site were constructed of corrugated asbestos on steel. The interior of the buildings were not inspected during the reconnaissance of the site. Suit filed by the Fontaine Woods Nursing Home against the current owners of the site (Thomas R. and Louise Moss) alleges that soil contamination of asbestos had occurred.

Attachments: Figure 1: Site Location Map
Figure 2: Survey Plat Map
General Warranty Deeds (2)
Data Transmittal: Sample Series TK9C7
Telephone Conversation Record
Preliminary Assessment Form 2070-12



SCALE 1:24000

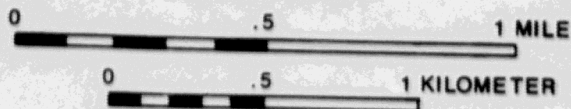


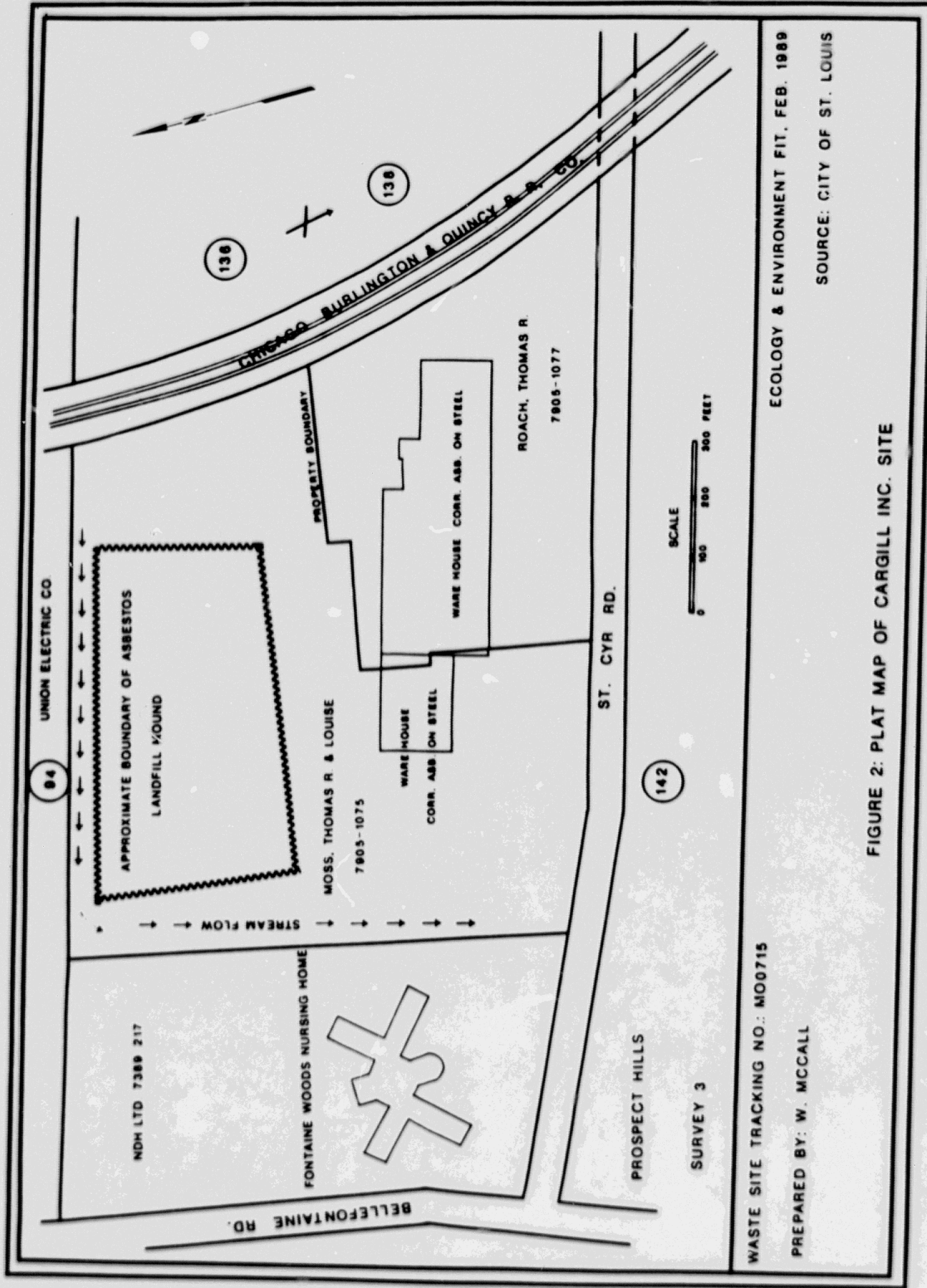
FIGURE 1: SITE LOCATION MAP

WASTE SITE TRACKING NO.: MO0715

PREPARED BY: W. MCCALL

ECOLOGY & ENVIRONMENT FIT, FEB. 1989

SOURCE: USGS GRANITE CITY, IL. QUADRANGLE, 1982



ECOLOGY & ENVIRONMENT FIT, FEB. 1989
SOURCE: CITY OF ST. LOUIS

FIGURE 2: PLAT MAP OF CARGILL INC. SITE

Doc 6721 for 735

General Warranty Deed

This Deed, Made and entered into this second day of April nineteen hundred and Seventy-Four

by and between

RECORDING REALTY COMPANY

105

of the City of Kansas City State of Missouri
part y of the first part, and

STATE OF MISSOURI) ss
COUNTY OF ST. LOUIS)
FILED FOR RECORD

CARGILL INCORPORATED
Cargill Building
Minneapolis, Minnesota 55402

'74 APR -3 AM 11:29

of the City of Minneapolis State of Minnesota
party of the second part.

Wm C. Fankle
RECORDER OF DEEDS

Witnesseth, that the said party of the first part, for and in consideration of the sum of One Hundred Dollars and Other Valuable Considerations paid by the said party of the second part, the receipt of which is hereby acknowledged, does by these presents, Grant, Bargain and Sell, Convey and Confirm unto the said party of the second part,

the following described Real Estate, situated in the County of St. Louis and State of Missouri, to-wit:

Part of Lots 1, 2 and '3 of PROSPECT HILL, a Subdivision of part of U. S. Surveys 3 and 1957 and part of Section 9, Township 46 North, Range 7 East, according to the plat thereof recorded in Plat Book 10 pages 12 and 13 of the City (former County) of St. Louis and described as follows: Beginning at a point in the North line of St. Cyr Road, distant South 74 degrees 57 minutes East, 450 feet from the East line of Bellefontaine Road, measured along the said North line of St. Cyr Road; thence North 3 degrees 9 minutes East 853.94 feet to a point in the North line of said Prospect Hill; thence South 83 degrees East, along the said North line of Prospect Hill, 801.21 feet to a point in the Western line of the Right of Way of St. Louis, Keokuk and Northwestern Railroad; thence Southeastwardly along said Right of Way, along a curve to the left having a radius of 1960 feet, 936.64 feet to a point; thence continuing along said Right of Way line, South 33 degrees 8-3/4 minutes East, 70.83 feet to a point in the North line of St. Cyr Road; thence North 82 degrees 54-1/2 minutes West, along the said North line of St. Cyr Road, 1074.23 feet to a point of angle; thence continuing along said North line of St. Cyr Road, North 74 degrees 57 minutes West, 213.09 feet to the point of beginning according to survey thereof executed by Pittman's Co., of Surveyors & Engineers on March 15, 1974.

To Have and to Hold the same, together with all rights and appurtenances to the same belonging, unto the said party of the second part, and to its successors, trustees,

heirs and assigns forever.

The said party of the first part hereby covenanting that it and its successors, heirs and assigns shall and will Warrant and Defend the title to the premises unto the said party of the second part, and to its successors, trustees

heirs and assigns forever

against the lawful claims of all persons whatsoever, excepting, however, the general taxes for the calendar year 1974 and thereafter, and the special taxes becoming a lien after the date of this deed.

In Witness Whereof, the said party of the first part has caused this Deed to be signed the day and year first above written.



RECORDING REALTY COMPANY
Wm C. Fankle
VICE PRESIDENT

NO-5721 PAGE 706

K92355 K92478

GENERAL WARRANTY DEED

(INDIVIDUAL)

County Fee

State Use Fee \$3.00

Total

This Deed, Made and entered into this 5th day of May, 1986, by and between

Thomas R. Roach and Marsha L. Roach, both single persons and Thomas R. Moss, Jr.
and Louise Moss, his wife
of the County of St. Louis State of Missouri party or parties of the first part, and

Thomas R. Moss and Louise Moss, his wife
10110 Bellefontaine, St. Louis, Mo. 63137
of the County of St. Louis State of Missouri party or parties of the second part.

WITNESSETH, that the said party or parties of the first part, for and in consideration of the sum of One Dollar and other valuable considerations paid by the said party or parties of the second part, the receipt of which is hereby acknowledged, does or do by these presents GRANT, BARGAIN AND SELL, CONVEY AND CONFIRM unto the said party or parties of the second part, the following described Real Estate, situated in the County of St. Louis and State of Missouri, to-wit:

621.

STATE OF MISSOURI
COUNTY OF ST. LOUIS
FILED FOR RECORD

1986 MAY -6 PM 3:32

See Exhibit A hereto attached and made a part hereof.

Subject to building lines, easements, conditions and restrictions of record, if any.

TO HAVE AND TO HOLD the same, together with all rights and appurtenances to the same belonging, unto the said party or parties of the second part, and to the heirs and assigns of such party or parties forever.

The said party or parties of the first part hereby covenanting that said party or parties and the heirs, executors and administrators of such party or parties, shall and will WARRANT AND DEFEND the title to the premises unto the said party or parties of the second part, and to the heirs and assigns of such party or parties forever, against the lawful claims of all persons whomsoever, excepting, however, the general taxes for the calendar year 1986 and thereafter, and special taxes becoming a lien after the date of this deed.

IN WITNESS WHEREOF, the said party or parties of the first part has or have hereunto set their hand or hands the day and year first above written.

Thomas R. Roach
Thomas R. Roach
Marsha L. Roach
Marsha L. Roach

Thomas R. Moss
Thomas R. Moss
Louise Moss
Louise Moss

STATE OF MISSOURI)

ss. On this 5th day of May, 1986, before me personally appeared County of St. Louis Thomas R. Roach and Marsha L. Roach, both single persons, formerly husband and wife and Thomas R. Moss and Louise Moss, his wife to me known to be the persons or persons described in and who executed the foregoing instrument, and acknowledge that they executed the same as their free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the County of St. Louis and State of Missouri, the day and year first above written.

Anne Taylor Proctor
Anne Taylor Proctor
Notary Public

My term expires:

MISSOURI PUBLIC NOTARIES
ST. LOUIS COUNTY

Prospect Hill, a Subdivision of part of U. S. Surveys 3 and 1937 and part of Section 9, Township 46 North, Range 7 East, according to the plat thereof recorded in Plat Book 10 pages 12 and 13 of the City (Pomeroy County) of St. Louis, Missouri, and being more particularly described as follows: Beginning at a point in the North line of St. Cyr Road, 60.00 feet wide, distant South 74 degrees 57 minutes East 450.00 feet from the East line of Bellefontaine Road, 60.00 feet wide, measured along the said North line of St. Cyr Road; thence North 03 degrees 03 minutes East 853.94 feet to a point in the North line of Prospect Hill, aforesaid; thence South 83 degrees East 881.21 feet along the said North line of Prospect Hill to a point on a curve on the West Right-of-Way line of the Chicago Burlington and Quincy Railroad, 100.00 feet wide; thence Southeastwardly along said Western Right-of-Way line along a curve to the left having a radius of 1960.00 feet, and whose radius point bears North 84 degrees 04 minutes 19 seconds East, 427.34 feet to a point on said Western Right-of-Way line; thence South 89 degrees 56 minutes 13 seconds West 304.60 feet to a point; thence South 02 degrees 28 minutes 11 seconds West 40.00 feet along the prolongation of the Western face of an existing Building to the North face of said Building; thence Westwardly along the North face of said Building North 87 degrees 31 minutes 49 seconds West 219.80 feet to a point; thence the following courses and distances through a common party wall, South 02 degrees 28 minutes 11 seconds West, 121.10 feet; thence South 87 degrees 31 minutes 49 seconds East 19.78 feet; thence South 02 degrees 28 minutes 11 seconds West 60.00 feet to a point on the South Building line; thence leaving said party wall South 00 degrees 27 minutes 01 seconds West 19.63 feet to a point; thence South 03 degrees 24 minutes 00 seconds West 186.68 feet to a point in the North line of said St. Cyr Road; thence Westwardly along said North line of St. Cyr Road North 82 degrees 54 minutes 30 seconds West 282.70 feet to an angle point in said North line of St. Cyr Road; thence continuing along said North line of St. Cyr Road North 74 degrees 57 minutes West 213.09 feet to the point of beginning.

END OF DOCUMENT

100-70000-1075

3

SI RE-ASSESSMENT

Site Name: CARGILL INC EPAID#: MOD980631204
City: BELLEFONTAINE NEIGHBORS State: MO SI Date: 11/18/88 ISPACTION DATE
4/21/89 REPORT DATE
SI Done By: EPA _____ Contractor X State _____ Other _____

SI SUMMARY (From SI Form)

WASTE Physical State: SOLID Quantity: UNKNOWN Units: _____

Type (category): TOX ASBESTOS Amount: UNKNOWN Units: _____

CONTAMINATION (indicate observed, alleged, potential, and population potentially affected in the appropriate column.)

Media	Observed	Potential	Alleged	Populat'n
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Groundwater NONE

Surface water NONE

Soil

ADJACENT FONTAINE WOODS NURSING HOME
ALLEGES ANALYTICAL EVIDENCE OF SOIL
CONTAMINATION BY ASBESTOS

Drinking Water NONE

POSSIBLE ASBESTOS PARTICULATES RELEASED
TO ATMOSPHERE FROM WASTES ON LANDFILL
SURFACE ORIGINALLY OPEN PILE, NOW COVERED
AND CAPPED

3000

OTHER(Describe)
(Air, Direct Contact, Flora/Fauna)

NOTICED 8-10 YD³ ASBESTOS CONTAINING
WASTES DUMPED ON SURFACE AFTER
CLOSURE. RECOMMENDED REMOVAL
OF THIS MATERIAL

SAMPLING

Sampling Done: Yes X No _____ If yes, When(date) 11/18/88

Sample Type	No. of Samples	Results
-------------	----------------	---------

Groundwater

5

PERCENTAGE OF CHRYSOTILE DETECTED:

7%, 15, 17, 31, 37

Surface water

Soil

Other

RECOMMENDATIONS, CONCLUSIONS (From File)

FINAL STRATEGY DETERMINATION: NO FURTHER ACTION NEEDED

This Summary Compiled By: Kim Holden Date: 4/24/89



POTENTIAL HAZARDOUS WASTE SITE
FINAL STRATEGY DETERMINATION

REGION SITE NUMBER

VII MOD 980631204

File this form in the regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency, Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW, Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME

CARGILL INC.

B. STREET

665 ST CYR RD

C. CITY

BEAUFONTAINE NEIGHBORS

D. STATE

MISSOURI

E. ZIP CODE

63137

II. FINAL DETERMINATION

Indicate the recommended action(s) and agency(ies) that should be involved by marking 'X' in the appropriate boxes.

RECOMMENDATION

ACTION AGENCY

MARK 'X'

EPA

STATE

LOCAL

PRIVATE

A. NO ACTION NEEDED

B. REMEDIAL ACTION NEEDED, BUT NO RESOURCES AVAILABLE
(If yes, complete Section III.)

C. REMEDIAL ACTION (If yes, complete Section IV.)

D. ENFORCEMENT ACTION (If yes, specify in Part E whether the case will be primarily managed by the EPA or the State and what type of enforcement action is anticipated)

E. RATIONALE FOR FINAL STRATEGY DETERMINATION

SITE INSPECTION REVEALED THAT ONLY PROBLEM IS THAT APPROXIMATELY 8-10 CUBIC YARDS OF AN ASBESTOS MATERIAL HAS BEEN DEPOSITED ON TOP OF AN ASBESTOS LANDFILL. REFERRED TO MDNR AS POSSIBLE NESHAP VIOLATION

F. IF A CASE DEVELOPMENT PLAN HAS BEEN PREPARED, SPECIFY THE DATE PREPARED (mo., day, & yr.)

G. IF AN ENFORCEMENT CASE HAS BEEN FILED, SPECIFY THE DATE FILED (mo., day, & yr.)

H. PREPARER INFORMATION

1. NAME

GREG REESOR

2. TELEPHONE NUMBER

(913) 236-2856

3. DATE (mo., day, & yr.)

6/20/89

III. REMEDIAL ACTIONS TO BE TAKEN WHEN RESOURCES BECOME AVAILABLE

List all remedial actions, such as excavation, removal, etc. to be taken as soon as resources become available. See instructions for a list of Key Words for each of the actions to be used in the spaces below. Provide an estimate of the approximate cost of the remedy.

A. REMEDIAL ACTION

B. ESTIMATED COST

C. REMARKS

\$

\$

\$

\$

\$

\$

\$

\$

D. TOTAL ESTIMATED COST

\$